Commonwealth of Kentucky
Environmental and Public Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382

Proposed

AIR QUALITY PERMIT
Issued under 401 KAR 52:020

Permittee Name:	**General Motors Corporation**
Mailing Address:	**600 Corvette Drive, PO Box 90006** **Bowling Green, KY 42101**
Source Name:	**Same as above**
Mailing Address:	**same as above**
Source Location:	**600 Corvette Drive, Bowling Green, KY**
Permit Number:	**V-06-013**
Source A. I. #:	**4109**
Activity #:	**APE200420002**
Review Type:	**Operating, Title V, PSD, MACT**
Source ID #:	**21-227-00005**
Regional Office:	**Bowling Green Regional Office** **1508 Westen Avenue** **Bowling Green** **KY 42104** **(270) 746-7475**
County:	**Warren**
Application Complete Date:	**October 27, 2005**
Issuance Date:	**August 4, 2006**
Revision Date:	
Expiration Date:	**August 4, 2011**

John S. Lyons, Director
Division for Air Quality

Revised 12/09/02

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SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:020, Title V Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Point 12 Prime Coat System
Description:

Electro Coat Dip Prime (Electrodeposition)

- Dip Tank, and Oven (Waterborne coating)
- Transfer Efficiency: 100%, assumed
- Coatings consumption: 1.6 gal/vehicle, approximately
- Date Commenced: December 2004

Type of control, enclosure, and efficiencies:

- Control Equipment: Regenerating Thermal Oxidizer (RTO)
- Destruction Efficiency: See most recent test
- Capture Efficiency: See most recent test

APPLICABLE REGULATIONS:

401 KAR 59:225, New miscellaneous metal parts and products surface coating operations.
40 CFR Part 63 Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks.

1. Operating Limitations:

a. **401 KAR 59:225**
The affected facility shall be exempt from Section 3 of 401 KAR 59:225 if the VOC content of the coating is less than 0.36 kg/l of coating (three (3.0) lb/gal), excluding water or exempt solvent (E. S.) or both, delivered to applicators associated with color coat or first coat on untreated ferrous substrate.

Initial Compliance Demonstration Method:
The permittee shall determine the VOC content of the coating as applied by using EPA Method 24. The VOC content of the coating must meet the requirement specified under **Operating Limitations.** [Regulation 40 CFR 60, Appendix A, Method 24, which has been incorporated by reference in 401 KAR 50:015].

Continuous Compliance Demonstration Method:
Once VOC content (as applied) of the coating used has been determined using the Method 24 testing method, the permittee may use MSDS or Technical Data Sheet to determine continuous compliance with the requirement specified under **Operating Limitations**. The following formula may be used for Continuous Compliance Demonstration:

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

VOC less water or less E.S. or both (lb/gal) =

$$\frac{(\text{Wt.\% of volatiles}) - \text{Wt. \% of water} - \text{Wt \%. of E. S.})}{100 - \text{\% Volume of Water} - \text{\%Volume of E. S}} \times \text{Coating Density(lbs/gal)}$$

Where:

$$\text{\% Volume water} = Coating\ \ density(lbs/gal) * \frac{weight\ \%\ water}{Density\ \ of\ \ water(8.34\ lbs/gal)}$$

$$\text{\% Volume E.S.} = \sum_{i=1}^{n} Coating\ Density(lbs/gal) * \frac{weight\ \%\ exempt\ solvent\ "i"}{density\ exempt\ solvent\ "i"}$$

%Wt. of volatiles, water, solids, E. S. or coating density may be obtained from the Technical Data Sheet

b. **40 CFR IIII Section 63.3094** work practice standards
See Emission Point: Flex Group Auto MACT

2 Emission Limitations:

a. **401 KAR 59:225**
See Operating Limitations

b. **Standard for HAPs (40 CFR IIII Section 3091, and 3092)**
See Emission Point: Flex Group Auto MACT

3. Testing Requirements:

a. Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 3.

Capture System:
The permittee shall determine the bake oven system's capture efficiency by using EPA Method 204 Appendix M. The following determinations should be considered:

1. Bake oven air seal: Bake oven air seal means an entry or entry vestibule to or an exit or exit vestibule from a bake oven which isolates the bake oven from the area immediately preceding (for an entry or entry vestibule) or immediately following (for an exit or exit vestibule) the bake oven. No significant VOC generating activity takes place in a bake oven air seal. Fresh air is supplied into a bake oven air seal and is then directed in part into the bake oven and in part into the area immediately preceding or immediately following the bake oven. A bake oven air seal is not considered to be a Natural Draft Opening (NDO).

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

2. Inward air flow into the electrocoat tank shall be demonstrated using smoke tubes.

b. **40 CFR Part 63 Subpart IIII Section 3151**
See Emission Point: Flex Group Auto MACT

4. Specific Monitoring Requirements:

a. See Recordkeeping Requirements.
b. The term "and exempt solvents", in respect to water, in the specific record keeping below in intended to include only water which is contained in the materials added to the electrocoat tank.

5. Specific Recordkeeping Requirements:

a. Daily records shall be maintained by the source for the most recent two (2) year period. These records shall be made available to the Cabinet or the U.S. EPA upon request. The records shall include, but not be limited to, the following:
1 Applicable administrative regulation number;
2 Application method and substrate type;
3 Amount and type of adhesive, coating (including catalyst and reducer for multicomponent coatings), or solvent used at each point of application, including exempt compounds;
4 The VOC content as applied in each adhesive, coating, or solvent;
5 The date of each application for each adhesive, coating, or solvent;
6 The amount of surface preparation, cleanup, or washup solvent (including exempt compounds) used and the VOC content of each.

b. **40 CFR Part 63 Subpart IIII Section 3130**
See Emission Point: Flex Group Auto MACT

6. Specific Reporting Requirements:

The following shall be reported semi-annually;

a. Any deviations from requirements of Section B shall be reported;
b. The VOC content as applied of each coating, reducer and each surface preparation, cleanup, or washup solvent (including exempt compounds) used.
c. **40CFR 63, IIII sections 3110 and Section 3120**
See Emission Point: Flex Group Auto MACT

7. Specific Control Equipment Operating Conditions:

See Section E

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Point 5 Primer Surfacer System
Description:

Spray Booth and Oven:

- Air spray application: Solvent-borne coating
- Transfer Efficiency: See most recent test
- Estimated Coatings consumption: 1.10 gal/vehicle
- Year Commenced: 1979

Type of control, enclosure, and efficiencies:

- Control Equipment: Regenerating Thermal Oxidizer (RTO)
- Destruction Efficiency: See most recent test
- Capture Efficiency: See most recent test
- Control Equipment (PM/PM10): Wet Eliminator
- Estimated Control Efficiency: 90%

Emission Point 8 Top Coat System
Description:

Spray Booths and Oven

- Waterborne base coat, Solvent-borne clear coat, Blackout capability
- Basecoat: Air spray application
- Clear coat: Electrostatic application
- Transfer Efficiency: See most recent test
- Estimated Coatings consumption:
  - Base Coat: 3.0 gals/vehicle,
  - Blackout: 0.2 gal/vehicle,
  - Clear Coat: 2.0 gals/vehicle
- Year Commenced: 1979

Type of control, enclosure, and efficiencies:

- Control Equipment (PM/PM10): Wet Eliminator
- Estimated Control Efficiency: 90%

Emission Point 13 Final Repair
Description:

Spray Booth and oven/Spovens

- Waterborne/ Solvent borne base coat, Solvent-borne clear coat
- Air spray application:
- Transfer Efficiency: 40% (40 CFR Part 63 Subpart IIII Section 63.3161(g))
- Estimated coatings consumption: 0.01 gal/vehicle
- Year Commenced: 1979

Type of control, enclosure, and efficiencies:

- Control Equipment (PM/PM10) Wet Eliminator (for Spray booths)
- Estimated Control Efficiency 90%

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

APPLICABLE REGULATIONS:
401 KAR 59:010, New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975);
40 CFR Part 63 Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks

1 Operating Limitations:

a. The usage rate of materials used in all affected facilities shall be limited so as not to exceed the emission limitations listed in Section B (2) below.
b. **40 CFR IIII Section 3094** work practice standards
See Emission Point: Flex Group Auto MACT

2. Emission Limitations:

a. **Standard for Opacity (401KAR 59:010 Section (3)):**

The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility which is equal to or greater than twenty (20) percent opacity.

Compliance Demonstration Method:

The permittee shall perform a qualitative visual observation of the opacity of emissions from the stack on a weekly basis and maintain a log of the observations. If visible emissions from the stack are seen (not including condensed water vapor within the plume), then the opacity shall be determined by Reference Method 9. If emissions are in excess of the applicable opacity limit, then an inspection shall be initiated of control equipment for all necessary repairs.

b. **Standard for Particulate Matter (401 KAR 59:010 Section 3(2)):**

All affected facilities were constructed after the classification date (July 2, 1975). If these affected facilities are below 0.5 ton/hr (on a potential basis) from a control device or stack, no person shall cause, suffer, allow or permit the emission in to the open air of particulate matter (PM) from any affected facility in excess of 2.34 lb/hr.

Compliance Demonstration Method:
The control system (Wet Eliminators for spray booths) are to be maintained and operated in accordance with the manufacturer's instruction or equivalent documents, and are to be operated at all times that parts are being painted. When the spray booths are operated in accordance with manufacturer's recommendations or equivalent documents, compliance with the mass limit is assumed.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

c. **Standards for VOC** (from Accommodative State Implementation Plan (SIP).
Permit # O-85-02

The permittee shall not discharge or cause to be discharged into the atmosphere, emissions from coating which exceed the following VOC content

1. Body Prime System:	5.29 lb/gal of coating
2. Top Coat System (Body), Metallic Colors:	5.3 lb/gal of coating
3. Top Coat System (Body), Solid Colors:	5.3 lb/gal of coating
4. Top Coat System, (Body) Clear Colors:	4.4 lb/gal of coating
5. Top Coat System (Bumper), Metallic Colors:	5.3 lb/gal of coating
6. Top Coat System (Bumper), Solid Colors:	5.3 lb/gal of coating
7. Top Coat System (Bumper), Clear Colors:	5.0 lb/gal of coating
8. Black out System:	4.2 lb/gal of coating

all above limits excluded water or exempt solvent (E. S.), or both, and are as delivered to the applicator.

Initial Compliance Demonstration Method:
The permittee shall determine the VOC content of the coating as applied by using EPA Method 24. The VOC content of the coating must meet the requirement specified under Emissions Limitations (standards for VOC)**.** [Regulation 40 CFR 60, Appendix A, Method 24, which has been incorporated by reference in 401 KAR 50:015].

Continuous Compliance Demonstration Method:
The permittee may use MSDS or Technical Data Sheet to determine continuous compliance. The following formula may be used for Continuous Compliance Demonstration:

VOC less water or less E.S. or both (lb/gal) =

$$\frac{(\text{Wt.\% of volatiles}) - \text{Wt. \% of water} - \text{Wt \%. of E. S.})}{100 - \text{\% Volume of Water} - \text{\%Volume of E. S}} \times \text{Coating Density(lbs/gal)}$$

Where:

$$\text{\% Volume water} = Coating\ \ density(lbs/gal) * \frac{weight\ \%\ water}{Density\ \ of\ \ water\,(8.34\ lbs/gal)}$$

$$\text{\% Volume E.S.} = \sum_{i=1}^{n} Coating\ Density(lbs/gal) * \frac{weight\ \%\ exempt\ solvent\ "i\ "}{density\ exempt\ solvent\ "i\ "}$$

%Wt. of volatiles, water in coating, solids, E. S. or coating density may be obtained from the Technical Data Sheet

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

d. **Standard for HAPs (40 CFR IIII Section 3091 and 3092)**
See Emission Point: Flex Group Auto MACT

3 Testing Requirements:

a. Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 3.
b. See Initial Compliance Demonstration Method
c. **40 CFR Part 63 Subpart IIII Section 3151**
See Emission Point: Flex Group Auto MACT

4. Specific Monitoring Requirements:

See Recordkeeping Requirements.

5. Specific Recordkeeping Requirements:

a. Monthly records shall be maintained by the source for the most recent two (2) year period. These records shall made available to the Cabinet or the U.S. EPA upon request. The records shall include, but not be limited to, the following:
1. Quantity and description of each coating and reducer used including exempt compounds;
2 The VOC content as applied of each coating, and reducer used.

b. **40 CFR Part 63 Subpart IIII Section 3130**
See Emission Point: Flex Group Auto MACT

6. Specific Reporting Requirements:

The following shall be reported semi-annually
a. Any deviations from requirements of Section B shall be reported;
b. The VOC content as applied of each coating, and reducer used in EP 5, EP8 and EP13.
c. **40 CFR Part 63 Subpart IIII Section 3110 and 3120**
See Emission Point: Flex Group Auto MACT

7. Specific Control Equipment Operating Conditions:

See Section E

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emission Point: 16 Miscellaneous Operations:

Description:

Remote or multiple location support functions are operations that are integral to vehicle assembly, but cannot be grouped into one physical area nor can the materials used be tracked by specific physical areas. These miscellaneous operations include cleaning solvents, miscellaneous sealer and adhesives and process fluids and tanks.

1. Miscellaneous Sealers and Adhesives
2. Productive Solvents
3. Paint Purge
4. Nonproductive Solvents and Booth Cleanup

APPLICABLE REGULATIONS:

401KAR 51:017; Prevention of significant deterioration of air quality;
40 CFR Part 63, Subpart IIII; National Emission Standard for Hazardous Air Pollutants: Surface Coating of Automobile and Light Duty trucks

1. Operating Limitations:

Effective until April 26, 2007 after which the 40 CFR Part 63 Subpart IIII, Section 3094, Flex Group Auto MACT**,** work practice applies:

a. **401KAR 51:017**
The following work practices shall be performed on Emission Point 16:
1. Use of masking to cover equipment, wherever practical, in the booths and on floors around the booths to reduce solvent usage.
2. Capture of paint line purge solvent wherever practical.
3. Use of low VOC or water based solvents in certain processes, where practical, such as for water based grate masking, high pressure water blasting, etc.
4. Avoidance of spillage and splashing during handling of solvent, and if spillage or leaks occur, they should be repaired or corrected immediately.
5. Use of covers or closed containers for both fresh and waste cleaning solvents.
6. Avoidance of the use of adsorbent or porous items, such as rags, bags, etc., for handling the solvent-wetted items.
7. Use of closed containers to store or dispose of cloth, paper, or other materials saturated with VOC.
8. Use of block painting as the highest priority consistent with production schedules and with maximum reduction in usage of VOC.
9. Reduction of purging to the minimum possible, consistent with quality considerations.

b. **40 CFR Part 63 Subpart IIII Section 3094** work practice standards
See Emission Point: Flex Group Auto MACT

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

2. Emission Limitations for VOC:

a. **401KAR 51:017**
VOC emissions from EP 16 (Miscellaneous Operations) shall not exceed 5.5 pounds/vehicle plus 106.9 tons per rolling 12-month period.

Compliance Demonstration Method:

Compliance shall be demonstrated by keeping of records, certification of records, and reporting as described under **5**, and **6** below. The vehicle/12 months (V) shall be calculated as the consecutive 12 month total of vehicle/mo. The 12 consecutive month VOC emission allowable shall be calculated as
Σ(1,2,--12) V*L/2000 + 106.9 = TOTAL ALLOWABLE VOC EMISSIONS (TONS/12 MONTHS)
where 1, 2,--12 represents the number of vehicles per month being summed over a 12-month period to give the total V (vehicle/12 months) and L equals 5.5 lbs/vehicle/12 month period. The factor of 2000 converts from pounds to tons.

b. **Standard for HAPs (40 CFR Part 63 Subpart IIII Section 3091 and 3092)**
See Emission Point: Flex Group Auto MACT

3. Testing Requirements:

a. VOC content of all materials used shall be varified annually using a method approved by the Division.
b. Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 3.
c. **40 CFR Part 63 Section 3151**
See Emission Point: Flex Group Auto MACT

4. Specific Monitoring Requirements:

a. The source shall maintain monthly records of material usage and VOC content. The source shall monitor number of vehicles produced per month off final line.
b. **40CFR part 63 Subpart IIII**
See Recordkeeping Requirements.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

5. Specific Record Keeping Requirements:

a. **401KAR 51:017**
Record keeping shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. This record keeping shall include number of vehicles per month. Record keeping shall also include pounds of VOC emitted per month (calculated from volume used and VOC content) for productive (EP 16-1, 2, and 3) and for non-productive (EP 16-4) categories under Miscellaneous Operations.

b. **40 CFR Part 63 Subpart IIII Section 3130**
See Emission Point: Flex Group Auto MACT

6. Specific Reporting Requirements:

a. **401KAR 51:017**
The copies of monthly records shall be kept under the provisions of condition **5** above and shall be reported semi–annually.

b. **40CFR Part 63, IIII Sections 3110 and 3120**
See Emission Point: Flex Group Auto MACT

7. Specific Control Equipment Operating Conditions:

See Section E

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emission Point: Flex Group Auto MACT

Description:

The combined Electrocoat, Primer Surfacer, Topcoat, Glass bonding primer and adhesives, and Final Repair, and all adhesives and sealer material other than materials used as components of glass bonding systems, and all deadener materials.

APPLICABLE REGULATION:

40 CFR Part 63 Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks

APPLICABLE DATE:
40 CFR Part 63 Subpart IIII Section 3083
The compliance date, which begins the initial compliance period is April 26, 2007. The initial compliance period ends on May 31, 2007. The initial demonstration of compliance with the following emission limits shall be made during the initial compliance period and monthly thereafter.

1. Operating limitations:

40 CFR Subpart IIII Section 3094 work practice standards

a. The permittee must develop and implement a work practice plan no later than April 26, 2007

b. The permittee must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, all coating operations in this flex group. The plan must specify practices and procedures to ensure that, at a minimum, the elements specified in paragraphs a (1) through (5) of this section are implemented.
   1. All organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers.
   2. The risk of spills of organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be minimized.
   3. Organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
   4. Mixing vessels, other than day tanks equipped with continuous agitation systems, which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
   5. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

c. The permittee must develop and implement a work practice plan to minimize organic HAP emissions from cleaning and from purging of equipment associated with all coating operations in this flex group.

1 The plan shall, at a minimum, address each of the operations listed in paragraphs c (1)(i) through (viii) of this section in which the permittee uses organic-HAP-containing materials or in which there is a potential for emission of organic HAP.

i. The plan must address vehicle body wipe emissions through one or more of the techniques listed in paragraphs (c)(1)(i)(A) through (E) of this section, or an approved alternative.
   A. Use of solvent-moistened wipes.
   B. Keeping solvent containers closed when not in use.
   C. Keeping wipe disposal/recovery containers closed when not in use.
   D. Use of tack-wipes.
   E. Use of solvents containing less than 1 percent organic HAP by weight.

ii. The plan must address coating line purging emissions through one or more of the techniques listed in paragraphs (c)(1)(ii)(A) through (D) of this section, or an approved alternative.
   A. Air/solvent push-out.
   B. Capture and reclaim or recovery of purge materials (excluding applicator nozzles/tips).
   C. Block painting to the maximum extent feasible.
   D. Use of low-HAP or no-HAP solvents for purge.

iii. The plan must address emissions from flushing of coating systems through one or more of the techniques listed in paragraphs (c)(1)(iii)(A) through (D) of this section, or an approved alternative.
   A. Keeping solvent tanks closed.
   B. Recovering and recycling solvents.
   C. Keeping recovered/recycled solvent tanks closed.
   D. Use of low-HAP or no-HAP solvents.

iv. The plan must address emissions from cleaning of spray booth grates through one or more of the techniques listed in paragraphs (c)(1)(iv)(A) through (E) of this section, or an approved alternative.
   A. Controlled burn-off;
   B. Rinsing with high-pressure water (in place).
   C. Rinsing with high-pressure water (off line).
   D. Use of spray-on masking or other type of liquid masking.
   E. Use of low-HAP or no-HAP content cleaners.

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

v. The plan must address emissions from cleaning of spray booth walls through one or more of the techniques listed in paragraphs (c)(1)(v)(A) through (E) of this section, or an approved alternative.
   A. Use of masking materials (contact paper, plastic sheet, or other similar type of material).
   B. Use of spray-on masking.
   C. Use of rags and manual wipes instead of spray application when cleaning walls.
   D. Use of low-HAP or no-HAP content cleaners.
   E. Controlled access to cleaning solvents.

vi. The plan must address emissions from cleaning of spray booth equipment through one or more of the techniques listed in paragraphs (c)(1)(vi)(A) through (E) of this section, or an approved alternative.
   A. Use of covers on equipment (disposable or reusable).
   B. Use of parts cleaners (off-line submersion cleaning).
   C. Use of spray-on masking or other protective coatings.
   D. Use of low-HAP or no-HAP content cleaners.
   E Controlled access to cleaning solvents.

vii. The plan must address emissions from cleaning of external spray booth areas through one or more of the techniques listed in paragraphs (c)(1)(vii)(A) through (F) of this section, or an approved alternative.
   A. Use of removable floor coverings (paper, foil, plastic, or similar type of material).
   B. Use of manual and/or mechanical scrubbers, rags, or wipes instead of spray application.
   C. Use of shoe cleaners to eliminate coating track-out from spray booths.
   D. Use of booties or shoe wraps.
   E. Use of low-HAP or no-HAP content cleaners.
   F. Controlled access to cleaning solvents.

viii. The plan must address emissions from housekeeping measures not addressed in paragraphs (c)(1)(i) through (vii) of this section through one or more of the techniques listed in paragraphs (c)(1)(viii)(A) through (C) of this section, or an approved alternative.
   A. Keeping solvent-laden articles (cloths, paper, plastic, rags, wipes, and similar items) in covered containers when not in use.
   B. Storing new and used solvents in closed containers.
   C. Transferring of solvents in a manner to minimize the risk of spills.

2. Notwithstanding the requirements of paragraphs (c)(1)(i) through (viii) of this section, if the type of coatings used in any facility with surface coating operations subject to the requirements of this section are of such a nature that the need for one or more of the practices specified under paragraphs (c)(1)(i) through (viii) is eliminated, then the plan may include approved alternative or equivalent measures that are applicable or necessary during cleaning of storage, conveying, and application equipment.

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

d. The Division for Air Quality or the U.S. Environmental Protection Agency (U.S. EPA), may choose to grant the permittee permission to use an alternative to the work practice standards in this section.
e. The work practice plans developed in accordance with the above are not required to be incorporated into this operating permit. Likewise, any revisions to the work practice plans developed above do not constitute a revision to this permit
f. Copies of the current work practice plans developed in accordance with paragraphs (a) and (b) of this section, as well as plans developed within the preceding 5 years must be available on-site for inspection and copying by the permitting authority.

2. Emission Limitations:

40 CFR part 63, Subpart IIII, Sections 3091, and 3092

a. The combined organic HAP emissions from the electrodeposition primer, primer surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesives operations must meet an emission limit of 0.6 pounds of HAPs per gallon of coating solids deposited during each month or,
b. The combined organic HAP emissions from the primer surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesives operations must meet an emission limit of 1.1 pounds of HAPs per gallon of coating solids deposited during each month if
   i. each individual material added to the electrocoat system contains no more than 1.0 percent by weight of any organic HAP and no more than 0.10 percent by weight of any organic HAP which is a OSHA – defined carcinogen or
   ii. The electrodeposition oven control device has a destruction or removal efficiency of at least 95 percent.
c. The monthly average organic HAP emissions from all adhesives and sealer materials other than materials used as components of glass bonding systems is limited to 0.01 pounds HAP per pound of adhesive and sealer material used.
d. The monthly average of organic HAP emissions from all deadener materials is limited to 0.01 pounds HAP per pound of deadener material used.

Initial Compliance Demonstration Method:
40 CFR part 63, Subpart IIII, Sections 3151 and 3171

a. The mass fraction of the organic HAP content of each material shall be determined using one of the following options;
   i. Method 311 (count each organic HAP measured to be present 0.1 percent by mass or more per OSHA defined carcinogens and 1.0 percent by mass or more for other compounds)
   ii. EPA Method 24 results as a substitute for the mass fraction of organic HAP
   iii. Manufacturers formulation data
   iv. An alternative method approved by administrator, or
   v. Solvent blends default values listed in Table 3 and 4 of this subpart

SECTION B – EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

b. The permittee must submit the Notification of Compliance Status no later than 30 days following the end of the initial compliance period. The Notification of Compliance Status must include: company name and address, a certification by the responsible official, the date of the report and beginning and ending dates of the reporting period, an identification of which compliance option specified in (a) or (b) above was used, a statement as to whether the emission limits were achieved and any deviations (including description and probable cause) that occurred, all data and calculations used to determine compliance with the limits, and a statement as to whether or not a work practice plan was developed and implemented.

Continuous Compliance Demonstration Method:
The permittee must perform monthly calculations to demonstrate that emission limits in 2 (a) through (d) above are being achieved.

3. Testing Requirements:

Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 3.

4. Specific Monitoring Requirements:

See Record Keeping Requirements

5. Specific Record Keeping Requirements:

40CFR 63, Subpart IIII Section 3130

The permittee must collect and keep records of the data and information specified herein. Failure to collect and keep these records is a deviation from the applicable standard.

a. A copy of each notification and report that has submitted to comply with this subpart, and the documentation supporting each notification and report.

b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP, the density and the volume fraction of coating solids for each coating, the mass fraction of organic HAP and the density for each thinner, and the mass fraction of organic HAP for each cleaning material. If testing was conducted to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the permittee uses information provided to the permittee by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided to the permittee by the manufacturer or supplier. If the permittee uses the results of an analysis conducted by an outside testing lab, the permittee must keep a copy of the test report. The Permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

c. A record, for each month, of the following:

i. For each coating used in the electrodeposition primer (if applicable), primer surfacer, topcoat, final repair, glass bonding adhesive operations and for each coating (except for deadener and for adhesive and sealer that are not components of glass bonding systems), a record of the volume of coating used in each month, the mass fraction organic HAP content and density (or the HAP content in pounds of HAP per gallon) , and the volume fraction solids. For each reducer/thineer used, a record of volume used in each month, the mass fraction HAPS and the density or the HAP content in pounds of HAP per gallon.

ii For each deadener and each adhesive and sealer that are not components of the glass bonding system, a record of the mass used per month and the mass organic HAP content.

iii. A record of the calculation of the organic HAP emission rate for the electrodeposition primer (if applicable), primer surfacer, topcoat, final repair, glass bonding adhesive operations and for each coating (except for deadener and for adhesive and sealer that are not components of the glass bonding systems), using the guidelines presented in the "Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and light duty truck topcoat operations: EPA -450/3-88-018 and all data inputs to this Protocol.

iv. A record for each month of the calculation of the average monthly mass organic HAP content of sealers and adhesives and for deadeners that are not components of the glassbonding system.

v. A record of the name, volume, density and mass fraction of organic HAP of each cleaning material used during the month.

vi. A record of the date, time and duration of each deviation, and for each deviation, a record of whether the deviation occurred during a period of startup, shutdown or malfunction.

vii. The records required by 40 CFR Part 63 Subpart A, Section 63.6 (e)(3)(iii) through (v) related to startup, shutdown, and malfunction and 63.3130(i) to (o) if control devices are used to achieve compliance.

vii. A record of the work practice plans required by Operating Limitations and documentation that you are implementing the plans on a continuous basis. Appropriate documentation may include operational and maintenance records, records of documented inspections, and records of internal audits.

d. The records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

e. The permittee must keep for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

f. The permittee must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records may be kept off site for the remaining 3 years.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

6. Specific Reporting Requirements:

a. **Notification of Compliance Status:**

40CFR 63, Subpart IIII Sections 3110 and Section 3120

The permittee must submit the initial Notification of Compliance Status no later than 30 days following the end of the initial compliance period. The Notification of Compliance Status must contain the following information.

1. Company name and address.
2. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
3. Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance which begins on the applicable compliance date (April 26, 2007) and ends on the last day of the month following the compliance date. If the compliance date occurs on any day other than the first day of the month, then the initial compliance period extends through the end of that month plus the next month.
4. Identification of the compliance option that was selected in the **Emission Limitations Section**.
5. Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.
6. If the permittee had a deviation, include the following;
   - i. A description and statement of the cause of the deviation.
   - ii If the permittee failed to meet any of the applicable emission limits in emission limitations, include all the calculations you used to determine the applicable emission rate or applicable average organic HAP content for the emission limit(s) that you failed to meet. You do not need to submit information provided by the materials suppliers or manufacturers, or test reports.
7. All data and calculations used to demonstrate monthly compliance with the emission limitations for the Electrodeposition primer (if applicable), primer surfacer, topcoat, glass bonding primers and final repair, the adhesive and sealer material other than materials used as components of the glass bonding system, and all deadeners materials.
8. A statement of whether or not permittee developed and implemented the work practice plans required by Operating Limitations.

b. **Reports**

1. The first semiannual compliance report must cover the first semiannual reporting period, which begins the day after the end of the initial compliance period described in 6(a)(3) which applies to emission points listed in **Flex Group Auto MACT** and ends on June 30 or December 31, whichever occurs first following the end of the initial compliance period.
2. Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

3. Each semiannual compliance report must be postmarked or delivered no later than July 30 or January 30, whichever date is the first date following the end of the semiannual reporting period.
4. Each semi-annual report shall contain:
   i. Company name and address.
   ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
   iii. Date of report and beginning and end dates of the semi-annual reporting period.
   iv. Identification of the compliance option selected in the **Emission Limitations Section**.
   v. A statement that there were no deviations from the **Emission Limitations** during the reporting period or if there was a deviation, include all data and calculations used to determine the monthly organic HAP emission rate for the combined Electrodeposition primer (if applicable), primer surfacer, topcoat, glass bonding primers and final repair, the adhesive and sealer material other than materials used as components of the glass bonding system, and all deadeners materials and the reason for the deviation.

7. Specific Control Equipment Operating Conditions:

See Section E

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Point: 35 Water Generator # 1 (Indirect Heat Exchanger)
Description:

Manufacturer:	Kewanee L3W – 250-G
Primary Fuel	Natural Gas
Secondary fuel:	Propane
Maximum rated capacity:	8.0 mmBTU/hr
Date Commenced	May 15, 1984

Emission Point: 36 Water Generator # 2
(Hot water Heater, > 120 gallons, Indirect Heat Exchanger)
Description:

Manufacturer:	Kewanee L3W – 250-G
Primary Fuel	Natural Gas
Secondary fuel:	Propane
Maximum rated capacity:	14.7 mmBtu/hr
Date Commenced**:**	March 20, 1990

Emission Point: 37 Water Generator # 3 (Indirect Heat Exchanger)
(Hot water Heater, > 120 gallons, Indirect Heat Exchanger)
Description:

Manufacturer:	Kewanee L3W – 350-G
Primary Fuel	Natural Gas
Secondary Fuel	Propane
Maximum rated capacity:	14.7 mm BTU/hr
Date Commenced:	October 15, 1991

APPLICABLE REGULATIONS:

a. **401 KAR 59:015, New Indirect Heat Exchangers;**

b. **40 CFR Part 63, Subpart DDDDD** National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters

EP 36 and 37 are classified as large liquid fuel units. These emission points are subject to only the initial notification requirements in § 63.7545(b) (i.e., they are not subject to the emission limits, work practice standards, performance testing, monitoring, SSMP, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart or any other requirements in subpart A of this part)

1. Operating Limitations:

The usage rate of materials used in all affected facilities shall be limited so as not to exceed the emission limitations listed in Section B (2) below.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

2. Emission Limitations:

a. **Standard for Particulate Matter (401AR 59:015, Sec. 4 (1))**:
   1. Particulate matter emissions from EP 35 shall not exceed 0.56 lb/mmBTU actual heat input; per three hour average;
   2. Particulate matter emissions from EP 36 shall not exceed 0.45 lb/mmBTU actual heat input, per three hour average;
   3. Particulate matter emissions from EP 37 shall not exceed 0.41 lb/mmBTU actual heat input, per three hour average.

b. **Standard for Opacity (401AR 59:015, Sec. 4 (2))**:
   The opacity emissions shall not exceed 20 percent except that a maximum of forty (40) percent shall be permissible for not more than six (6) consecutive minutes in any sixty (60) consecutive minutes during cleaning the fire box or blowing soot.

c. **Standard for Sulfur Dioxide (SO_2)(401AR 59:015, Sec. 5)**:
   1. Sulfur dioxide emissions from EP 35 shall not exceed 3.0 lb/mmBTU actual heat input;
   2. Sulfur dioxide emissions from EP 36 shall not exceed 2.07 lb/mmBTU actual heat input;
   3. Sulfur dioxide emissions from EP 37 shall not exceed 1.71 lb/mmBTU actual heat input.

   Compliance Demonstration Method:
   These emission points are assumed to be in compliance with the particulate matter**,** sulfur dioxide and opacity limits while burning natural gas or propane.

3. Testing Requirements:

Testing shall be conducted at such times as may be required by the cabinet in accordance with the Regulations 401 KAR 59:005 Section 2(2) and KAR 50:045 Section 3.

4. Specific Monitoring Requirements:

The permittee shall monitor and maintain monthly records of natural gas in million cubic feet or propane in 1000 gallons used.

5. Specific Recordkeeping Requirements:
See Specific Monitoring Requirements above.

6. Specific Reporting Requirements:
None

7. Specific Control Equipment Operating Conditions:
None

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Point: 38 Plant Wide Combustion (Direct Heat Exchanger)
Description:

Various air makeup units, door heaters, regenerative thermal oxidizer and oven burners

Total Rated Capacity:	260 mm BTU/hr
Primary Fuel:	Natural Gas
Secondary Fuel	Propane
Date Commenced:	Between 1981 and thereafter

APPLICABLE REGULATIONS:

None

1. Operating Limitations:

None

2. Emission Limitations:

None

3. Testing Requirements:

None

4. Specific Monitoring Requirements:

The permittee shall monitor and maintain monthly records of natural gas in million cubic feet or propane in 1000 gallons used.

5. Specific Record keeping Requirements:

See Specific Monitoring Requirements above.

6. Specific Reporting Requirements:

None

7. Specific Control Equipment Operating Conditions:

None

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:020, Section 6. While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

	Description	Generally Applicable Regulation
1.	Laboratory Equipment and Laboratory fume hood	59:010, 63:020
2.	Grinding machines, and abrasive pneumative conveying conveying and wood working ops	59:010
3.	Maintenance Welding	59:010, 63:020
4.	Arc Welding (inside and outside of the building)	59:010, 63:020
5.	Conditioning (Blow out) oven	None
6.	Multistage phosphate system	None
7.	Feather Dusters	59:010
8.	Bulk Storage material transferring equipments	None
9.	Emergence Diesel Generators	59:010
10.	High Pressure Water Cleaning equipment	59:010
11.	Body washer	None
12.	Misc. aerosol spray cans	59:010, 63:020
13	Mechanical repair ops	59:010
14.	Mobile equipment battery charge area	None
15.	Material storage	59:010
16.	Paint pump repair shop	59:010
17.	Parts washer and rinse tanks	None
17.	Storage tanks for inorganic liquid	None
18.	Pressurized storage tanks	None
19.	Cleanup Activity	None
20.	Maintenance of interior and exterior building	None
21.	Spot sanding	59:010
22.	Storage tanks (gasoline and diesel fuels)	63:020
23.	Storage tanks (new paint purge solvent and waste purge solvent)	63:020
24.	Storage tanks (automotive transmission fluid)	63:020
25.	Storage tanks (power steering fluid and rear axle fluid)	63:020
26.	Export (transit) coating ops	59:010
27.	Mig Welding	59:010, 63:020
28.	Paint lab Ops.	59:010, 63:020
29	1500 HP (Diesel)	
30.	Primer surfacer, topcoat, and paint repair sanding ops.	59:010
31.	Final repair sanding	59:010
32.	Interior Vented sanding	59:010
33.	Misc. spot repair ops.	59:010
34.	Maintenance wash/paint booth	59:010, 63:020
35.	Combined oven spray booth	59:010, 63:020
36.	Mig welding (exterior exhaust,-vent system	59:010, 63:020

SECTION C - INSIGNIFICANT ACTIVITIES (CONTINUED)

37.	Inspection Finish Booth	None
38.	Vehicle fluid fill ops.	None
39.	Spot Welding	None
40.	Cooling towers	None

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. VOC emissions, as measured by methods referenced in 401 KAR 50:015, Section 1, shall not exceed the respective limitations specified herein.

2. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

3. The hours of operation of the source shall not exceed 5094 per rolling 12-month period.

   Compliance Demonstration Method:
   Monthly hours of production off final line shall be recorded.

4. Source wide VOC emissions (including VOC emissions from Insignificant Activities and Combustion units) shall not exceed 8907 pounds of VOC per day.

   Compliance Demonstration Method:
   a. The monthly pounds of VOC emissions required to be calculated under EP 5, 8, 12, 13, 16, 35, 36, 37, and 38 shall divided by the monthly production days and compared to the 8907 pounds of VOC per day.

   b. The following equation may be used to calculate VOC emission from natural gas consumption:

      Monthly VOC emission = Monthly usage of natural gas (million cubic feet) X 5.5 lb/Million cubic feet

   c. The following equation may be used to calculate VOC emission from propane consumption:
      Monthly VOC emission = Monthly usage of propane (1000 gallons) X 0.5 lb/1000 gallons

5. The source shall not produce more than 76,410 vehicles per rolling 12-month period.

   Compliance Demonstration Method:
   Monthly vehicles produced shall be recorded and shall be used to calculate the rolling 12-month total and compared to the 76,410 vehicles per rolling 12-month.

6. Source wide coating usage shall not exceed 525,773 gallons per rolling 12-month period.

   Compliance Demonstration Method:
   Monthly coating usage shall be recorded and shall be used to calculate the rolling 12-month total and compared to the 525,773 gallons per rolling 12-month.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

7. The minimum Destruction Efficiency for the Regenerating Thermal Oxidizer (RTO) must be maintained at 80%.

Compliance Demonstration Method:
The permittee shall maintain a record of the RTO combustion temperature as a demonstration that the destruction efficiency is being maintained. (See Section E)

8. Sourcewide emissions of VOCs shall not exceed 1260 tons per rolling 12-month period.

Compliance Demonstration Method:

a. The total pounds of VOC per month required to be calculated in EP5, 8, 12, 13, 16, 35, 36, 37, 38 and Insignificant Activities (See Section C) shall be added to the previous 11 months pounds of VOC and divided by 2000 pounds per ton.
b. The following equation may be used to calculate VOC emission from natural gas consumption:

   Monthly VOC emission = Monthly usage of natural gas (million cubic feet) X 5.5 lb/Million cubic feet
c. The following equation may be used to calculate VOC emission from propane consumption:
   Monthly VOC emission = Monthly usage of propane (1000 gallons) X 0.5 lb/1000 gallons

9 **Specific Reporting Requirements:**

The following shall be reported semi-annually as per Section F 5

a. Monthly hours of production off final line.
b. The monthly pounds of VOC emissions under EP 5, 8, 12, 13, 16, 35, 36, 37, and 38 and monthly production days
c. Monthly vehicles produced and rolling 12-months total vehicles produced.
d. Monthly coating usage and rolling 12-month total coating usage.
e. The total pounds of VOC per month in EP 5, 8, 12, 13, 16, 35, 36, 37, 38 and Insignificant Activities (See Section C) added to the previous 11 months pounds of VOC and divided by 2000 pounds per ton.

ECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

Control Device: Regenerating Thermal Oxidizer (RTO)
Maximum rated capacity of the burners: 24.0 mmBtu/hr (Natural Gas)
The control device was installed in February 1994

A. Operating Limitations:

1. Pursuant to 401 KAR 50:055, Section 2(5), the permittee shall operate the thermal oxidizer at all times surface coating is being performed.
2. The average combustion temperature of Regenerating Thermal Oxidizer (RTO) in any 3-hour period must not fall more than 28 degrees Celsius (50 degrees Fahrenheit) below the average combustion temperature limit established during the most recent performance test.

B. Testing Requirements:

1. If the most recent RTO performance test is more than five (5) years old, within six (6) months of issuance of this permit. The permittee shall conduct a performance test on the RTO and furnish the Division's Bowling Green office with a written report of the results of such performance tests or demonstrate compliance to a duly authorized representative of the Division.
2. The permittee shall use the data collected during the performance test to calculate and record the average combustion temperature. This average combustion temperature is the minimum operating set point of the thermal oxidizer.
3. The permittee shall install, calibrate, maintain and operate in accordance with manufacturer's specifications a temperature monitoring system consisting of a thermocouple in the firebox of the thermal oxidizer or in the duct immediately downstream of the firebox before any substantial heat exchange occurs, a voltage-to-temperature convertor and a temperature continuous recording device.
4. The thermocouple shall have an accuracy of the greater of 0.75 percent of the temperature measurement expressed in degrees Celsius or $\pm 2.5^{o}C$.
5. Before using the thermal couple for the first time or when relocating or replacing the thermocouple, the permittee shall perform a validation check by comparing the combustion chamber monitoring and controller temperature outputs to each other. The thermocouple is considered validated if the difference between the two temperature readouts is less than 30 degrees Fahrenheit.
6. See Section G (17)

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

C. Specific Monitoring Requirements:

1. The permittee must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs. Compliance shall be demonstrated by monitoring and recording the combustion temperature continuously*.
   *Continuous parameter monitoring shall be a minimum of recording the measured value at least once every 15 minutes.
2. The permittee must perform an electronic calibration semi-annually (on a calendar year basis) of the convertor/temperature readout device. Following the electronic calibration, a thermocouple validation check must be conducted in which the readout device of a second or redundant thermocouple must yield a reading within 30 degrees Fahrenheit of each other.
3. The permittee must conduct an accuracy audit consisting of an electronic calibration of the convertor/temperature readout device and validation of the thermocouple any time the thermocouple exceeds the manufacturer's specified maximum operating temperature range or install a new or lab certified thermal couple.
4. The permittee must at least monthly, inspect components for integrity and electrical connections for continuity, oxidation, and galvanic corrosion.

D. Specific Recordkeeping Requirements:

The permittee shall maintain records of the following information for the thermal oxidizer:

i The design and/or manufacturer's specifications or equivalent document.

ii. The operational procedures and preventive maintenance records.

iii The calibration records for the convertor/readout device, thermocouple validation checks, and any subsequent accuracy audits.

iv Maintain a record (electronically or by strip chart) of the average combustion chamber temperature limit established during the most recent performance test and all relevant supporting data.

vi The combustion chamber temperature of the thermal oxidizer shall be recorded continuously except for limited downtime during electronic calibration.

vii All periods (during coating operations) during which the combustion chamber temperature of the thermal oxidizer is more than 28 degrees Celsius (50 degrees Fahrenheit) below the average combustion chamber temperature of the thermal oxidizer during the most recent performance test which demonstrated compliance. Each occurrence shall be considered a deviation from permit requirements.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

viii During all periods of operation of the thermal oxidizer in which the combustion chamber temperature of the thermal oxidizer is more than 28 degrees Celsius (50 degrees Fahrenheit) below the average combustion chamber temperature of the thermal oxidizer during the most recent performance test which demonstrated compliance, or other malfunction of the thermal oxidizer, a daily log of the following information shall be kept:

a. Whether any air emissions were visible from the facilities associated with the thermal oxidizer.
b. Whether visible emissions were normal for the process.
c. The cause of the visible emissions.
d. Corrective action(s) taken shall be recorded.

ix A control efficiency of 0% shall be assumed for all periods the thermal oxidizer is receiving emissions during which the combustion chamber temperature of the thermal oxidizer is more than 28 degrees Celsius (50 degrees Fahrenheit) below the average combustion chamber temperature of the thermal oxidizer during the most recent performance test.

2. All records shall be retained at the source for a period of five years.

Emission Capture System:

A. Testing Requirements:

Capture System:

The permittee shall determine the bake oven system's capture efficiency by using EPA Method 204 Appendix M. The following determinations should be considered:

a. Bake oven air seal: Bake oven air seal means an entry or entry vestibule to or an exit or exit vestibule from a bake oven which isolates the bake oven from the area immediately preceding (for an entry or entry vestibule) or immediately following (for an exit or exit vestibule) the bake oven. No significant VOC generating activity takes place in a bake oven air seal. Fresh air is supplied into a bake oven air seal and is then directed in part into the bake oven and in part into the area immediately preceding or immediately following the bake oven. A bake oven air seal is not considered to be a Natural Draft Opening (NDO).
b. Inward air flow into the bake oven shall be demonstrated using smoke tubes.
c. See Section G (17)

B. Specific Reporting Requirements: The following shall be reported semi annually

1. The permittee shall submit a written report to the Division's Bowling Green's Field office for each deviation from the permitted conditions.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

1. Pursuant to Section 1b (IV)1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
    a. Date, place as defined in this permit, and time of sampling or measurements;
    b. Analyses performance dates;
    c. Company or entity that performed analyses;
    d. Analytical techniques or methods used;
    e. Analyses results; and
    f. Operating conditions during time of sampling or measurement.

2. Records of all required monitoring data and support information, including calibrations, maintenance records, and electronic or original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [Sections 1b(IV) 2 and 1a(8) of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

3. In accordance with the requirements of 401 KAR 52:020 Section 3(1)h the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
    a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
    b. To access and copy any records required by the permit:
    c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

    Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

5. Semi-annually reports of any monitoring required by this permit, other than continuous emission or opacity monitors, shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Section 1b (V)1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

6. The semi-annual reports are due by January 30th and July 30th of each year. Data from the continuous emission and opacity monitors shall be reported to the Technical Services Branch in accordance with the requirements of 401 KAR 59:005, General Provisions, Section 3(3). All reports shall be certified by a responsible official pursuant to 401 KAR 52:020 Section 23. All deviations from permit requirements shall be clearly identified in the reports.

7. In accordance with the provisions of 401 KAR 50:055, Section 1 the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
    a. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
    b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.

8. The owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Section F.7. above) to the Regional Office listed on the front of this permit within *30 days*. Other deviations from permit requirements shall *be included in the semiannual report required by Section F.6* [Section 1b (V) 3, 4. of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

9. Pursuant to 401 KAR 52:020, Permits, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit and the U.S. EPA in accordance with the following requirements:
    a. Identification of the term or condition;
    b. Compliance status of each term or condition of the permit;
    c. Whether compliance was continuous or intermittent;
    d. The method used for determining the compliance status for the source, currently and over the reporting period.
    e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications should be mailed to the following addresses:

Division for Air Quality
Bowling Green Regional Office
1508 Westen Avenue
Bowling Green, KY 42104

Division for Air Quality
Central Files
803 Schenkel Lane
Frankfort, KY 40601

U.S. EPA Region 4
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960

10. In accordance with 401 KAR 52:020, Section 22, the permittee shall provide the Division with all information necessary to determine its subject emissions within thirty (30) days of the date the KYEIS emission survey is mailed to the permittee.

11. Results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days or sooner if required by an applicable standard, after the completion of the fieldwork.

SECTION G - GENERAL PROVISIONS

(a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:020 and of the Clean Air Act and is grounds for enforcement action including but not limited to termination, revocation and reissuance, revision or denial of a permit [Section 1a, 3 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020 Section 26].

2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a, 6 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

3. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:020, Section 19. The permit will be reopened for cause and revised accordingly under the following circumstances:
    a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:020, Section 12;
    b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
    c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;

    Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the conditions of this permit [Section 1a, 7,8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such facts or corrected information to the permitting authority [401 KAR 52:020, Section 7(1)].

SECTION G - GENERAL PROVISIONS (CONTINUED)

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a, 14 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a, 4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

8. Except for requirements identified in this permit as state-origin requirements, all terms and conditions shall be enforceable by the United States Environmental Protection Agency and citizens of the United States [Section 1a, 15 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6) [Section 1a, 10 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:020, Section 11(3)(b)].

11. This permit does not convey property rights or exclusive privileges [Section 1a, 9 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Environmental and Public Protection or any other federal, state, or local agency.

13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry [401 KAR 52:020, Section 11(3)(d)].

14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders [401 KAR 52:020, Section 11(3)(a)].

15. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.

SECTION G - GENERAL PROVISIONS (CONTINUED)

16. Pursuant to 401 KAR 52:020, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of issuance. Compliance with the conditions of a permit shall be considered compliance with:
    a. Applicable requirements that are included and specifically identified in the permit and
    b. Non-applicable requirements expressly identified in this permit.

17. Pursuant to 401 KAR 50:045, Section 2, a source required to conduct a performance test shall submit a completed Compliance Test Protocol form, DEP form 6028, or a test protocol a source has developed for submission to other regulatory agencies, in a format approved by the cabinet, to the Division's Frankfort Central Office a minimum of sixty (60) days prior to the scheduled test date. Pursuant to 401 KAR 50:045, Section 7, the Division shall be notified of the actual test date at least Thirty (30) days prior to the test.

(b) Permit Expiration and Reapplication Requirements

1. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:020, Section 12].

2. The authority to operate granted shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:020 Section 8(2)].

(c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of 401 KAR 52:020, Section 14(2).

2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

SECTION G - GENERAL PROVISIONS (CONTINUED)

(d) Construction, Start-Up, and Initial Compliance Demonstration Requirements
None

(e) Acid Rain Program Requirements

If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

(f) Emergency Provisions

1. Pursuant to 401 KAR 52:020 Section 24(1), an emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
    a. An emergency occurred and the permittee can identify the cause of the emergency;
    b. The permitted facility was at the time being properly operated;
    c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
    d. Pursuant to 401 KAR 52:020, 401 KAR 50:055, and KRS 224.01-400, the permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
    e. This requirement does not relieve the source of other local, state or federal notification requirements.

2. Emergency conditions listed in General Condition (f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:020, Section 24(3)].

3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:020, Section 24(2)].

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:

    RMP Reporting Center
    P.O. Box 1515
    Lanham-Seabrook, MD 20703-1515.

2. If requested, submit additional relevant information to the Division or the U.S. EPA.

SECTION G - GENERAL PROVISIONS (CONTINUED)

(h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
    a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
    b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
    c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
    d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166
    e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
    f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.

SECTION H - ALTERNATE OPERATING SCENARIOS

Not applicable.

SECTION I - COMPLIANCE SCHEDULE

Not applicable.